

**EXHIBIT 5-g to PLAINTIFFS'
APPENDIX OF EXPERT REPORTS**

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September 24, 2020

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VIA E-MAIL

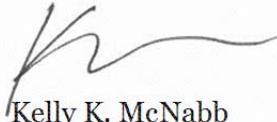
Carl R. Metz
Williams & Connolly, LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005-5901

RE: *City of Huntington, et al. v. AmerisourceBergen Drug Corp., et al.*
Materials for Dr. Katherine Keyes

Dear Mr. Metz:

In response to your September 22, 2020 letter, please find enclosed the requested calculations related to Dr. Katherine Keyes' sensitivity tests. We disagree with your characterization of Dr. Keyes' testimony, the purported "relevance" of the sensitivity tests, and the assertion that the previous production was incomplete. Contrary to your letter, Dr. Keyes did not testify that the calculations were "relevant" to her analyses. All of the calculations relevant to Dr. Keyes' report were provided in the workbook that you received several weeks ago.

Very truly yours,



Kelly K. McNabb

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* suppressed values were set to 5

		Rx opioids including synthetic: T40.2, T40.3, T40.4	Rx opioids not including synthetic: T40.2, T40.3	Synthetic opioids only: T40.2-T40.4 minus T40.2 and T40.3	Only synthetic opioids / all Rx opioids (We used WV rates as Cabell rates were based on small numbers)
1999		5	5	5	0 0.44444444
2000		5	5	5	0 0.18918919
2001		12	12	5	7 0.20610687
2002		15	15	12	3 0.14792899
2003		15	15	5	10 0.13612565
2004		17	17	13	4 0.19166667
2005		5	5	5	0 0.2189781
2006		21	20	16	4 0.12
2007		37	33	28	5 0.18927445
2008		25	25	19	6 0.15789474
2009		5	5	5	0 0.15822785
2010		25	23	23	0 0.12296984
2011		36	29	26	3 0.09160305
2012		22	18	18	0 0.09512761
2013		42	26	24	2
2014		45	32	27	5
2015		69	48	29	19
2016		87	69	29	40
2017		132	124	24	100
2018	Cabell	105	104	17	87
1999		28	27	15	12 0.44444444
2000		39	37	30	7 0.18918919
2001		135	131	104	27 0.20610687
2002		174	169	144	25 0.14792899
2003		193	191	165	26 0.13612565
2004		247	240	194	46 0.19166667
2005		138	137	107	30 0.2189781

WV	2006	279	275	242	33	0.12
	2007	328	317	257	60	0.18927445
	2008	367	342	288	54	0.15789474
	2009	175	158	133	25	0.15822785
	2010	447	431	378	53	0.12296984
	2011	547	524	476	48	0.09160305
	2012	464	431	390	41	0.09512761
	2013	487	414	368	46	
	2014	541	437	383	54	
	2015	621	512	380	132	
	2016	728	640	340	300	
	2017	828	795	304	491	
	2018	696	681	234	447	
	1999	5441	4030	3442	588	0.14590571
	2000	5848	4400	3785	615	0.13977273
	2001	6957	5528	4770	758	0.13712012
	2002	9168	7456	6483	973	0.13049893
	2003	10237	8517	7461	1056	0.12398732
	2004	11449	9857	8577	1280	0.12985695
National	2005	12570	10928	9612	1316	0.1204246
	2006	15338	13723	11589	2134	0.15550536
	2007	16391	14408	12796	1612	0.11188229
	2008	17307	14800	13149	1651	0.11155405
	2009	18322	15597	13523	2074	0.13297429
	2010	19155	16651	14583	2068	0.12419674
	2011	20588	16917	15140	1777	0.10504227
	2012	21036	16007	14240	1767	0.1103892
	2013	23153	16235	14145	2090	
	2014	27119	18893	14838	4055	
	2015	31546	22598	15281	7317	
	2016	40778	32445	17087	15358	
	2017	46394	40051	17029	23022	
	2018	45925	40893	14975	25918	

Average of T40.4 only deaths directly attributable (average of average, 17.6)			All T40.4 deaths directly attributable			No T40.4 de	
Directly attributable to Rx opioids	Deaths due to non-Rx opioids	Deaths due to Prescription Opioids	Directly attributable to Rx opioids	Deaths due to non-Rx opioids	Deaths due to Prescription Opioids	Directly attributable to Rx opioids	
5	0	0	5	0	0	5	
5	0	0	5	0	0	5	
12	0	0	12	0	0	5	
15	0	0	15	0	0	12	
15	0	0	15	0	0	5	
17	0	0	17	0	0	13	
5	0	0	5	0	0	5	
20	1	1	20	1	1	16	
33	4	2	33	4	2	28	
25	0	0	25	0	0	19	
5	0	0	5	0	0	5	
23	2	1	23	2	1	23	
29	7	4	29	7	4	26	
18	4	2	18	4	2	18	
24	18	10	26	16	9	24	
28	17	9	32	13	7	27	
32	37	20	48	21	11	29	
36	51	27	69	18	10	29	
42	90	48	124	8	4	24	
32	73	39	104	1	1	17	
27	1	1	27	1	1	15	
37	2	1	37	2	1	30	
131	4	2	131	4	2	104	
169	5	3	169	5	3	144	
191	2	1	191	2	1	165	
240	7	4	240	7	4	194	
137	1	1	137	1	1	107	

275	4	2	275	4	2	242
317	11	6	317	11	6	257
342	25	13	342	25	13	288
158	17	9	158	17	9	133
431	16	9	431	16	9	378
524	23	12	524	23	12	476
431	33	18	431	33	18	390
376	111	59	414	73	39	368
393	148	79	437	104	56	383
403	218	116	512	109	58	380
393	335	179	640	88	47	340
391	437	233	795	33	18	304
313	383	205	681	15	8	234
4030	1411	753	4030	1411	753	3442
4400	1448	773	4400	1448	773	3785
5528	1429	763	5528	1429	763	4770
7456	1712	914	7456	1712	914	6483
8517	1720	918	8517	1720	918	7461
9857	1592	850	9857	1592	850	8577
10928	1642	877	10928	1642	877	9612
13723	1615	862	13723	1615	862	11589
14408	1983	1059	14408	1983	1059	12796
14800	2507	1339	14800	2507	1339	13149
15597	2725	1455	15597	2725	1455	13523
16651	2504	1337	16651	2504	1337	14583
16917	3671	1960	16917	3671	1960	15140
16007	5029	2685	16007	5029	2685	14240
14411	8742	4668	16235	6918	3694	14145
15353	11766	6283	18893	8226	4393	14838
16211	15335	8189	22598	8948	4778	15281
19039	21739	11609	32445	8333	4450	17087
19955	26439	14118	40051	6343	3387	17029
18269	27656	14768	40893	5032	2687	14975

Deaths directly attributable		Average of T40.4 only deaths directly attributable (average of average, 17.6 (summed average, 17.1)			Assuming average number of 2012 Rx fentanyl deaths	
Deaths due to non-Rx opioids	Deaths due to Prescription Opioids attributable to non-Prescription Opioids	Directly attributable to Rx opioids	Deaths due to non-Rx opioids	Deaths due to Prescription Opioids	Directly attributable to Rx opioids	Deaths due to non-Rx opioids
0	0	5	0	0	5	0
0	0	5	0	0	5	0
7	4	12	0	0	12	0
3	2	15	0	0	15	0
10	5	15	0	0	15	0
4	2	17	0	0	17	0
0	0	5	0	0	5	0
5	3	20	1	1	20	1
9	5	33	4	2	33	4
6	3	25	0	0	25	0
0	0	5	0	0	5	0
2	1	23	2	1	23	2
10	5	29	7	4	29	7
4	2	18	4	2	18	4
18	10	24.342	17.658	9	27	15
18	10	27.855	17.145	9	30	15
40	21	32.249	36.751	20	32	37
58	31	35.84	51.16	27	32	55
108	58	41.1	90.9	49	27	105
88	47	31.877	73.123	39	20	85
13	7	27	1	1	27	1
9	5	37	2	1	37	2
31	17	131	4	2	131	4
30	16	169	5	3	169	5
28	15	191	2	1	191	2
53	28	240	7	4	240	7
31	17	137	1	1	137	1

37	20	275	4	2	275	4
71	38	317	11	6	317	11
79	42	342	25	13	342	25
42	22	158	17	9	158	17
69	37	431	16	9	431	16
71	38	524	23	12	524	23
74	40	431	33	18	431	33
119	64	375.866	111.134	59	403	84
158	84	392.234	148.766	79	418	123
241	129	402.572	218.428	117	415	206
388	207	391.3	336.7	180	375	353
524	280	387.961	440.039	235	339	489
462	247	310.437	385.563	206	269	427
1999	1067	4030	1411	753	4030	1411
2063	1102	4400	1448	773	4400	1448
2187	1168	5528	1429	763	5528	1429
2685	1434	7456	1712	914	7456	1712
2776	1482	8517	1720	918	8517	1720
2872	1534	9857	1592	850	9857	1592
2958	1580	10928	1642	877	10928	1642
3749	2002	13723	1615	862	13723	1615
3595	1920	14408	1983	1059	14408	1983
4158	2220	14800	2507	1339	14800	2507
4799	2563	15597	2725	1455	15597	2725
4572	2441	16651	2504	1337	16651	2504
5448	2909	16917	3671	1960	16917	3671
6796	3629	16007	5029	2685	16007	5029
9008	4810	14502.39	8650.61	4619	15550	7603
12281	6558	15531.405	11587.595	6188	16243	10876
16265	8686	16532.207	15013.793	8017	16686	14860
23691	12651	19713.218	21064.782	11249	18492	22286
29365	15681	20965.762	25428.238	13579	18434	27960
30950	16527	19406.978	26518.022	14161	16380	29545

er of 1999- ths/year	Average of T40.4 only deaths directly attributable (average of average, 17.6)	All T40.4 deaths directly attributable
Deaths due to non- Prescription Opioids attributable to Prescription Opioids		
0	5	5
0	5	5
0	12	12
0	15	15
0	15	15
0	17	17
0	5	5
1	21	21
2	35	35
0	25	25
0	5	5
1	24	24
4	33	33
2	20	20
8	34	35
8	37	39
20	52	59
29	63	79
56	90	128
45	71	105
1	28	28
1	38	38
2	133	133
3	172	172
1	192	192
4	244	244
1	138	138

2
6
13
9
9
12
18
45
66
110
189
261
228
753
773
763
914
918
850
877
862
1059
1339
1455
1337
1960
2685
4060
5808
7935
11901
14931
15777

277
323
355
167
440
536
449
435
472
519
572
624
518
4783
5173
6291
8370
9435
10707
11805
14585
15467
16139
17052
17988
18877
18692
19079
21636
24400
30648
34073
33037

No T40.4 deaths directly attributable	Average of T40.4 only deaths directly attributable (average of average, 17.6 (summed average, 17.1)	Assuming average number of 1999-2012 Rx fentanyl deaths/year
Total prescription opioid attributable	Total prescription opioid attributable	Total prescription opioid attributable
5	5	5
5	5	5
9	12	12
14	15	15
10	15	15
15	17	17
5	5	5
19	21	21
33	35	35
22	25	25
5	5	5
24	24	24
31	33	33
20	20	20
34	33.342	35
37	36.855	38
50	52.249	52
60	62.84	61
82	90.1	83
64	70.877	65
22	28	28
35	38	38
121	133	133
160	172	172
180	192	192
222	244	244
124	138	138

262	277	277
295	323	323
330	355	355
155	167	167
415	440	440
514	536	536
430	449	449
432	434.866	448
467	471.234	484
509	519.572	525
547	571.3	564
584	622.961	600
481	516.437	497
4509	4783	4783
4887	5173	5173
5938	6291	6291
7917	8370	8370
8943	9435	9435
10111	10707	10707
11192	11805	11805
13591	14585	14585
14716	15467	15467
15369	16139	16139
16086	17052	17052
17024	17988	17988
18049	18877	18877
17869	18692	18692
18955	19121.39	19610
21396	21719.405	22051
23967	24549.207	24621
29738	30962.218	30393
32710	34544.762	33365
31502	33567.978	32157

